POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT EPS FORM 3012-III

INDUSTRIAL NARRATIVE SHEET

1. Site Identification:

Site number: MSD000693176

Site name: Enterprise Recovery Systems (ERS)

Site county: Marshall

2. Industrial Narrative Summary:

Company Name: ERS

Address: Route 5, Box 287 or P. O. Box 567

Byhalia, MV Collierville, TN 38017

10300665

Telephone No.: (601) 851-7557

Contact: Joe Spilka

Contact: Robert Thompson

Discussion: ERS is involved in recovery of solvents and (paint and lacquer) thinners via distillation. Waste generated from this process are solids. Until January 1984, these solids were sent to a BFI sanitary landfill in Memphis, TN based on small quantity generation. This activity has been evaluated by the MS BOPC with the result that ERS is required to send all this waste to a hazardous waste application which will be reviewed by the MS permitting board during the first week of April, 1984. Several weak areas have been noted, some of which are currently being addressed.

1. Analysis reports from sources other than the state on BFI are poorly documented. Results submitted are not certified and methods of analysis are not specified. No on-site testing (other than boiling points) indicated.

2. Neighbors have complained of paint odor present. ERS indicates that there is always some. No information has been provided about the levels of solvents present in the air. In light of a documented explosion on-site (Oct. 21, 1983) ambient solvent levels are of concern. Because of the fire hazard and considering employee health

and safety, monitoring may be needed using NIOSH or OSHA guidelines.

In a water sample discharge from the oil water separator, volatile organics were indicated present. A bioassay has been done on the wastewater indicating some toxicity but the waste was not highly toxic. The organics detected (12/8/83 sample) were not all reported in their 1980 permit application and may vary dependant on the material being recycled. Continued scrutiny of organic levels in the wastewater is indicated. Several complaints have been made about materials being spilled during the course of operation. In the most recent spill, soil contamination levels were documented, however, the present contamination on-site has not been fully documented. Color photographs in the NPDES file indicate several areas where vegetation has been killed and some soil discoloration noted in Sampling to document present contamination levels is suggested. In addition, 2 private wells are located in close proximity to the site so continued care must be taken to prevent contamination of drinking water. Groundwater monitoring is not typically required at a site of this nature. Based on the number of reported spill incidents, the company should demonstrate that it can operate without futher incident.

3. Disposition:

This facility is currently under very close scrutiny by the MS BOPC. They have a hazardous waste permit pending approval. Currently, ERS is operating under interim status.

4. Comments:

Several problems have been noted with the site. These problem areas have been noted in the narrative above and submitted to the MS BOPC along with suggestions for consideration during the permit review process.